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David J. Sheehan Nicholas J. Cremona Presentment Date: July 6, 2016

Time: 12:00 p.m.

Objections Due: July 6, 2016

Time: 11:30 a.m.

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

NOTICE OF PRESENTMENT OF PROPOSED ORDER GRANTING SUPPLEMENTAL AUTHORITY TO STIPULATE TO EXTENSIONS OF TIME TO RESPOND AND ADJOURN PRE-TRIAL CONFERENCES

PLEASE TAKE NOTICE that Irving H. Picard, as trustee (the "Trustee") for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq. ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee's undersigned counsel, will present the attached proposed Order Granting Supplemental Authority to Stipulate to Extensions of Time To Respond and Adjourn Pre-Trial Conferences, a copy of which is annexed

hereto as <u>Exhibit A</u> (the "Order"), to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on **July 6, 2016 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Order ("Objections"), shall (i) be in writing; (ii) conform to the Federal Rules of Bankruptcy

Procedure, Local Bankruptcy Rules and General Orders; (iii) specify the name of the objecting party and state with specificity the basis of the objection(s) and the specific grounds therefore;

(iv) be filed in accordance with the electronic filing procedures for the United States Bankruptcy

Court for the Southern District of New York, with a proof of service, and a courtesy copy

delivered to the Chambers of the Honorable Stuart M. Bernstein, One Bowling Green, New

York, New York 10004; and (v) be served upon (a) Baker & Hostetler LLP, Counsel for the

Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and

(b) the Securities Investor Protection Corporation, 1667 K Street, NW, Suite 1000, Washington,

DC 20006-1620, Attn: Kevin H. Bell, Esq., so as to be received no later than July 6, 2016 at

11:30 a.m.

PLEASE TAKE FURTHER NOTICE, that in the event any Objections are timely served and filed, a hearing may be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE, that if no timely Objections are served or filed

the proposed Order may be signed without a hearing.

Dated: New York, New York

June 22, 2016

By: /s/David J. Sheehan

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